

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

v.

JOSEPH DAVOUDZADEH, also known as

"Yousef Davoudzadeh,"

Defendant.

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I N F O R M A T I O N

Cr. No. CR-98-381  
(T. 26, U.S.C., §  
7206(1); and T. 18,  
U.S.C., §3551 et seq.)

Filed: 06/05/98

THE UNITED STATES CHARGES:

On or about October 17, 1996, within the Eastern District of New York, the defendant JOSEPH DAVOUDZADEH, a resident of Roslyn, New York, did knowingly and willfully make and subscribe a 1995 joint U.S. Individual Income Tax Return (Form 1040) on behalf of himself and his spouse, which was verified by a written declaration that it was made under penalties of perjury and was filed with the Director, Internal Revenue Service Center at Holtsville, New York, which return he did not believe to be true and correct as to every material matter, in that said 1995 U.S. Income Tax Return stated that the adjusted gross income was \$29,095, whereas, as he then and there well knew and believed, the adjusted gross income for 1995 was substantially higher than reported.

(Title 26, United States Code, Section 7206(1); Title 18,  
United States Code, Section 3551 et seq.)

\_\_\_\_\_/s/\_\_\_\_

ZACHARY W. CARTER  
United States Attorney

\_\_\_\_\_/s/\_\_\_\_

JOEL I. KLEIN  
Assistant Attorney General

\_\_\_\_\_/s/\_\_\_\_

RALPH T. GIORDANO  
Chief, New York Office

U.S. Department of Justice  
Antitrust Division